## Appendix 1: Full Set of APII Targets and Measures

Target	APII Measure	Source
PROCESS TARGET 1: By	P1.1 By December 31, 2004, answer yes or no,	
December 2004, define a process which ensures that regulated	was the process developed	
facilities will be covered under	_	
just one primary compliance	Baseline Due: N/A	
document. <sup>1</sup> By December 2005 complete development and begin implementation.	Check: December 31, 2004 Responsible for Collecting: Workgroup 4	
implementation.	P1.2 By December 31, 2005, count the	Use Air Permit Software to
	percentage of facilities with more than one	count the number of primary compliance documents per
	primary compliance document.	facility.
	Baseline Due: September 30, 2004 Rechecks: December 31, 2005 and June 30, 2006.	
	Responsible for Collecting: Workgroup 4	
PROCESS TARGET 2: By	P2.1 By December 31, 2005, answer yes or no,	
December 2005, develop,	was a process developed for each type of	
document, communicate, and manage an updated, consistent,	existing permit action.	
and accurate process for issuing,		
renewing, and revising permits.	Baseline Due: N/A	
Incorporate procedures for any new regulatory approaches into	Check: December 31, 2005	
the process. Update procedures	Responsible for Collecting: Workgroup 4	
regularly.	P2.2 By June 30, 2006 spot check primary	Workgroups 2, 3, and 4 will
	compliance documents and supporting	need to build measurement
	technical documents for consistency (defined	strategies into the processes
	per manual code) reviewing 10% which are	they develop. Workgroup 5
	selected based on customer input, sector, new	needs to come up with the
	applicable regulations, or other salient issues.	overall method for continued
	This will set a baseline consistency level for the	management of consistency
	new process(es) developed to meet this target.	
	Baseline Due: June 30, 2006	
	Rechecks: N/A	
	Responsible for Collecting: Workgroup 5	

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Target	APII Measure	Source
	P2.3 By June 30, 2006 evaluate whether processes are up to date and effectively communicated.	During each biennial program review, conduct interviews with permit drafters and managers.
	Baseline Due: June 30, 2006	
	Rechecks: N/A	
	Responsible for Collecting: Workgroup 5	
Answer questions on permit process and permit policy quickly and accurately resulting in a consistent statewide program providing certainty to staff, permittees, and the public.	<ul> <li>P3.1 Track the following:</li> <li>the number of questions received each month,</li> <li>the number of questions answered,</li> <li>the average response time for answered questions,</li> <li>the text of all questions</li> <li>the person who asked the question</li> </ul>	Workgroup 5 will be responsible for establishing a short term and long term process that meets the target and can supply data for the measure.
	Baseline Due: September 30, 2004	
	Rechecks: December 31, 2004; March 30,	
	2005; June 30, 2005; September 31, 2005;	
	December 31, 2005; March 31, 2006 and June	
	30, 2006	
	P3.2 No less frequently than on a semi-annual basis, contact persons who had questions to determine their satisfaction with the certainty provided by the answer.	Work group 5 will be responsible for establishing a method for measuring.
	Baseline Due: None	
	Rechecks: December 31, 2004; June 30, 2005;	
	December 31, 2005; June 30, 2006 Responsible for Collecting: Workgroup 5	
PROCESS TARGET 4: Make 100% of permit decisions according to deadlines specified in 2003 WI Act 118.	<ul> <li>P4.1 Track the percentage of operation and construction permit decisions made according to deadlines specified in 2003 WI Act 118.</li> <li>These deadlines are:</li> <li>for operation permits - 180 days after receipt of a complete application.</li> <li>for construction permits - 60 days after the end of the public comment period</li> <li>Baseline Due: June 30, 2004</li> <li>Rechecks: Quarterly until June 30, 2006</li> </ul>	Sample Equation % permits issued by deadline = (number of permits issued by deadlines during the previous 6 months) / (total number issued during the previous 6 mo) x 100% Air Permit Software tracking is used to track number of permits issued and the number of days
100% of permit decisions according to deadlines specified	P4.1 Track the percentage of operation and construction permit decisions made according to deadlines specified in 2003 WI Act 118.  These deadlines are:  • for operation permits - 180 days after receipt of a complete application.  • for construction permits - 60 days after the end of the public comment period	% permi (number deadline months) during th 100% Air Perm used to t

Target	APII Measure	Source
CUSTOMER SERVICE	C1.1 By December 31, 2004 answer yes or no,	Source
TARGET #1: Track key events	is a tracking system on the web for all users to	
of permit applications in "real	view.	
time". By December 2004, make	Baseline Due: N/A	
event tracking and support	Check: December 31, 2004	
documents available on the	Responsible for Collecting: Workgroup 2	
Department's website in a timely		
manner for all customers. By June 2006, the Air Program will	C1.2 By June 30, 2006 answer yes or no,	
be able to receive and process	applications can be received and processed	
applications electronically.	electronically.	
	Baseline Due: N/A	
	Check: June 30, 2006	
	Responsible for Collecting: Workgroup 6	
	C1.3 By June 30, 2006 evaluate level of	Workgroup 2 will establish the
	customer satisfaction with the web site.	criteria. Recommend ease of
		use and appropriateness of
	Baseline Due: June 30, 2006	content.
	Rechecks: N/A	
	Responsible for Collecting: Workgroup 2	
	G2.4 D. V. G0.2007	26.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1
CUSTOMER SERVICE	C2.1 By June 30, 2005, measure the level of all	Method to be developed by
<b>TARGET #2:</b> By July 2005, the Air Program will develop a	parties' understanding of the process including the structure and everyone's roles and	workgroup 2
partnership among the public,	responsibilities.	
business, EPA and internal staff		
related to the function of	Baseline Due: June 30, 2005	
permitting and the role of the	Rechecks: June 30, 2006	
Department. All parties are	Responsible for Collecting: Workgroup 2	
aware of how to participate in	Responsible for Concernig. Workgroup 2	
the permit and permit rule-		
making processes in a meaningful way.		
meaningful way.		
	C2.2 By June 30, 2005, develop the baseline	Method to be developed by
	level of all parties' satisfaction with the process	workgroup 2. Baseline will
	including the structure and everyone's roles	need to be established so as to
	and responsibilities.	measure change in satisfaction
		level.
	Baseline Due: June 30, 2005	
	Rechecks: June 30, 2006	Workgroup 2 needs to consult
	Responsible for Collecting: Workgroup 2	with Ed Nelson on how to
	1	reach public that doesn't know how to participate.
		now to participate.

Target	APII Measure	Source
CUSTOMER SERVICE TARGET #3: By July 2005, the Air Program will develop methods to ensure that businesses and interested parties	C3.1 By June 30, 2005 answer yes or no, were methods developed to increase understanding of compliance documents, compliance demonstration, and conflict resolution.	
have a clear understanding of the content of primary compliance documents; how facilities demonstrate compliance; and	Baseline Due: N/A Check: June 30, 2005 Responsible for Collecting: Workgroup 2	
how to effectively resolve conflicts with the Air Program.	C3.2 Evaluate the degree of implementation of the methods.	Perform a check based on the methods developed
	Baseline Due: June 30, 2005	
	Rechecks: June 30, 2006 Responsible for Collecting: Workgroup 2	
	C3.3 Level of satisfaction of all businesses and interested parties, with their understanding of the compliance document and their ability to resolve conflicts.	Follow up with customers by ways of focus groups or survey. This will occur during the biennial program review.
	Baseline Due: June 30, 2005	
	Rechecks: June 30, 2006 Responsible for Collecting: Workgroup 2	
	C3.4 Track numbers of monitoring requirement appeals, commence construction waivers, permit challenges and other conflicts as determined by Workgroup 2.	Method to track number of "other" conflicts to be developed by workgroup 2.
	Baseline Due: December 31, 2004	
	Rechecks: June 30, 2005 and June 30, 2006 Responsible for Collecting: Workgroup 2	

Target	APII Measure	Source
ENVIRONMENT TARGET #1: The Air Program sets data driven environmental goals and outcomes. By June 2005, demonstrate how the primary compliance document aids in meeting these goals and outcomes by fostering compliance, promoting improved environmental performance and rewarding businesses that go beyond compliance.	E1.1 By January 31, 2005, answer yes or no, has the air program set data driven environmental goals.  Baseline Due: N/A Check: January 31, 2005 Responsible for Collecting: Workgroup 5 E1.2 APII will be responsible until June 30, 2006 for measures recommended by Workgroup 5 that demonstrate how the primary compliance document aids in meeting the environmental goals.	Note: environmental goals and measures will be determined by the Management Workgroup (#5). Please see attached list of recommended measures in Appendix 1.
ENVIRONMENT TARGET #2: By July 2005, provide data on the web, which shows the relationship between local air pollution levels and public health. This will be continually evaluated and updated.	Baseline Due: June 30, 2005 Rechecks: June 30, 2006 Responsible for Collecting: Workgroup 5 E2.1 By June 30, 2005, answer yes or no, is appropriate, accurate, and timely data available on the internet.  Baseline Due: N/A Check: June 30, 2005 Responsible for Collecting: Workgroup 2	Suggested: a GIS display, analysis of ambient air monitoring data and public health data (hospital admissions, mortality, etc.); forecasting of air quality including predictions of ozone action days and high particulate matter emission days.  Workgroup 2 will coordinate the gathering of this data in collaboration with DHFS.
	E2.2 Level of customer satisfaction with the information posted.  Baseline Due: June 30, 2005  Rechecks: June 30, 2006  Responsible for Collecting: Workgroup 2	Set up feedback loop process on web site to gather information on satisfaction level with site. Follow up with customers by ways of focus groups or survey. This will occur during the biennial program review.

Target	APII Measure	Source
FINANCIAL TARGET #1: By	F1.1 Track number of the hours spent per	Sample equation
June 2006, reduce the hours	individual permit action on an annual program-	Hrs per op permit review=
spent per permit review, renewal,	wide basis. Permit actions include operation	(total hours spent in FY03 on
and revision by 20-40% each,	permit review, operation permit renewal,	operation permit review time
while providing equal or better	operation permit revision, construction permit	code AMES01)/(number of
environmental protection.	review, and construction permit revision.	operation permits issued in FY03 as reported on APS)
	Baseline Due: June 30, 2004	1
	Rechecks: June 30, 2005 and June 30, 2006	
	Responsible for Collecting: Workgroup 4	
	F1.2 Track the annual emission rates at	Use AEMS data to track annual
	regulated facilities and correlate data with selected economic indicators.	emissions at regulated facilities.  Data should be gathered in a
		manner that supports individual
	Baseline Due: September 30, 2004 (for FY04)	workgroup needs (See Source
	Rechecks: June 30, 2005 and June 30, 2006	information for Innov/Learning
	Responsible for Collecting: Workgroup 5	Target 2.)
	F1.3 Track the compliance rates at regulated	Use WACD and Compliance
	facilities.	Certification Reports to track compliance rates: number of
	Baseline Due: September 30, 2004 (for FY04)	certifying facilities in
	Rechecks: June 30, 2005 and June 30, 2006	compliance divided by the total
	Responsible for Collecting: Workgroup 5	number of certifying facilities.
FINANCIAL TARGET #2: By	F2.1 From a selected subset of facilities that	Permit review documents.
June 2006, reduce by 40-50% the	have requested and/or been issued a permit	
need to revise or modify permits.	revision or modification, determine the percent	Use the Air Permit software to
This could be accomplished by:	reduction in the number of facilities required to	identify the subset of permit
sharing draft permits;	obtain the same permit under today's rules. By	modifications, revisions and/or
incorporating flexibility; utilizing, modifying, or	September 30, 2004, define the subset of permit modifications, revisions and/or revision	revision requests. To provide a
expanding exemptions; offering	requests. By June 30, 2006, evaluate the subset	meaningful baseline, the subset should be representative of the
alternatives; or refining existing	and determine the percent reduction. The	mix and type of permit actions
regulations. Evaluate the results	original subset will be reevaluated by June 30,	requested under today's rules
of these strategies to ensure that	2006 to determine the need for additions and/or	(YR 2004) and reevaluated
they are consistent with our	deletions.	annually (if necessary) to
environmental and public input		remain current.
goals.	Baseline Due: September 30, 2004	
	Rechecks: June 30, 2006	
	Responsible for Collecting: Workgroups 3 & 4	
	F2.2 Track the number of operation permit	Use this data as an indicator. A
	revision requests and the numbers of	rise in the number of permit
	construction/modification permit applications	actions should be investigated
	submitted at each permitted (or nonexempt)	to see if it is caused by
	facility.	implementation of rules,
		procedures, breakdown in
	Baseline Due: September 30, 2004	communication, inadequate training, etc. Steps should be
	Rechecks: June 30, 2005 and June 30, 2006	taken to reduce permit actions
	Responsible for Collecting: Workgroup 4	if deemed appropriate.
	<u> </u>	ii decined appropriate.

Target	APII Measure	Source
FINANCIAL TARGET #3: Continue allocating resources in alignment with funding constraints, to support program priorities and customer needs.	F3.1 Quarterly workplan v. PALs v. authorized positions report to AMT, by funding source. Goal PALs is within 10% of Workplan Baseline Due: September 30, 2004 (for FY04)	Sheri Stach to run report on automated workplanning and PALs databases.
	Rechecks: December 31, 2004; March 31,	
	2005; June 30, 2005; September 30, 2005;	
	December 31, 2005; March 31, 2006; June 30, 2006	
	Responsible for Collecting: Workgroup 5	
	F3.2 Semi-annual Grant & Grant-Match report to AMT. Goal Grant is earned 100%, Grant is matched at required level.	Sheri Stach to develop report each April and October.
	Baseline Due: October 15, 2004	
	Rechecks: April 15, 2005; October 15, 2005;	
	April 15, 2006; October 15, 2006	
	Responsible for Collecting: Workgroup 5	
	F3.3 Semi-annual report to AMT on dollars spent by funding source v. spending authority of funding source. Goal spending is aligned with spending authority for each funding source, and spending within a funding source is spent on activities authorized under that funding source.	Sheri Stach to develop report each December and June.
	Baseline Due: September 15, 2004	
	Rechecks: February 15, 2005; September 15,	
	2005; February 15, 2006; September 15, 2006	
	Responsible for Collecting: Workgroup 5	
	F3.4 Evaluate level of customer satisfaction with staffing levels for the services that are important to them.	Follow up with customers by ways of focus groups or survey. This will occur during the biennial program review.
	Baseline Due: December 31, 2005	
	Rechecks: June 30, 2006 Responsible for Collecting: Workgroup 5	

F3.5 Measure the backlog of uncompleted program commitments for each year. This should include commitments for each year. This should include commitments for issuance, renewal and revisions of primary compliance documents as well as commitments for compliance activities. Primary compliance documents should include: traditional major and minor permits; general and registration permits; gEPs, Green Tier agreements, and EMS permits; and exemption confirmation letters requested by facilities.  Baseline Due: September 30, 2004 (for FY04) Rechecks: June 30, 2005 and June 30, 2006 Responsible for Collecting: Workgroup 5  IN1.1 By February 28, 2005 answer yes or no, have the skill sets, competencies, and organizational culture needed for staff and managers to work effectively and consistently with permits and other regulatory strategies. By December 2005, ensure that staff and managers have and maintain the skills defined.  Baseline Due: February 28, 2005 Responsible for Collecting: Workgroup 5  IN1.2 By December 2005, develop and administer an evaluation system to determine whether managers and staff have achieved the desired competency levels.  Baseline Due: February 28, 2005 Rechecks: December 31, 2005; June 30, 2006 Responsible for Collecting: Workgroup 5  IN1.3 Evaluate level of customer satisfaction with our culture.  Baseline Due: December 31, 2004  Follow up with customers by ways of focus groups or survey. This will occur during the biennial program review.	Target	APII Measure	Source
Baseline Due: December 31, 2004 biennial program review.	INNOVATION AND LEARNING TARGET #1: By February 2005, define the skill sets and organizational culture needed for staff and managers to work effectively and consistently with permits and other regulatory strategies. By December 2005, ensure that staff and managers have and maintain the skills	F3.5 Measure the backlog of uncompleted program commitments for each year. This should include commitments for issuance, renewal and revisions of primary compliance documents as well as commitments for compliance activities. Primary compliance documents should include: traditional major and minor permits; general and registration permits; ERPs, Green Tier agreements, and EMS permits; and exemption confirmation letters requested by facilities.  Baseline Due: September 30, 2004 (for FY04) Rechecks: June 30, 2005 and June 30, 2006 Responsible for Collecting: Workgroup 5  IN1.1 By February 28, 2005 answer yes or no, have the skill sets, competencies, and organizational culture been defined.  Baseline Due: N/A  Check: February 28, 2005 Responsible for Collecting: Workgroup 5  IN1.2 By December 2005, develop and administer an evaluation system to determine whether managers and staff have achieved the desired competency levels.  Baseline Due: February 28, 2005 Rechecks: December 31, 2005; June 30, 2006 Responsible for Collecting: Workgroup 5	Measure annually using the APS, WACD, and workplans. Commitments for permits are defined as meeting statutory or rule deadlines for responding. Commitments for Full Compliance Evaluations (FCE's) are according to the WDNR CMS Plan and annual FCE list. Commitments for other alternative tools shall be defined in the baseline.  Management Workgroup 5 to develop evaluation system.  The evaluation system may be incorporated into the established individual performance review cycle. The 360-degree evaluation may be a useful tool. Data from the agency customer feedback line may also be useful.  Follow up with customers by ways of focus groups or survey. This will occur during the
Rechecks: June 30, 2006		·	biennial program review

IN2.1 By June 30, 2006 answer yes or no, has a registration permit program will have available a registration permit program and at least tow or more other regulatory alternatives to traditional permiting for qualifying sources. Such alternatives will provide equal or better environmental protection and opportunity for public input.  Baseline Due: N/A Check: June 30, 2006 answer yes or no, at least two alternatives regulatory tools have been developed and are being used by at least 1 facility. Such tools should not include traditional permits, consolidated construction/operation permits, expanded general permits, or registration permits.  Baseline Due: N/A Check: June 30, 2006 Responsible for Collecting: Workgroup 1 IN2.2 By June 30, 2006 Responsible for Collecting: Workgroup 8 IN2.3 At each facility where an alternative regulatory tool is used, track whether emissions have been reduced or eliminated since use of the alternative tool. Track over a 5-year period. Conduct an analysis of the cause of emissions reductions, specifically whether the reduction was due to the use of the alternative regulatory tool and would not otherwise have occurred. Baseline Due: For each facility prior to use of alternative tool. Rechecks: June 30, 2006 Responsible for Collecting: Workgroup 8	June 2006, the Air Program will have available a registration permit program and at least two or more other regulatory alternatives to traditional permitting for qualifying sources. Such alternatives will provide equal or better environmental protection and opportunity for public input.  Baseline Due: N/A Check: June 30, 2006 Responsible for Collecting: Workgroup 11 IN2.2 By June 30, 2006 answer yes or no, at least two alternative regulatory tools have been developed and are being used by at least 1 facility. Such tools should not include traditional permits, or registration permits.	Target	APII Measure	Source
	Check: June 30, 2006 Responsible for Collecting: Workgroup 8  IN2.3 At each facility where an alternative regulatory tool is used, track whether emissions have been reduced or eliminated since use of the alternative tool. Track over a 5-year period. Conduct an analysis of the cause of emissions reductions, specifically whether the reduction was due to the use of the alternative regulatory tool and would not otherwise have occurred. Baseline Due: For each facility prior to use of alternative tool.  Rechecks: June 30, 2006  At each facility where an alternative regulatory tool is used, use AEMS to establish a baseline emission inventory for the facility. Use the facility is annual consolidated reporting to track whether emissions have been reduced or eliminated since use of the alternative tool.  Track over a 5-year period. Make adjustments to get desired results.	INNOVATION AND LEARNING TARGET #2: By June 2006, the Air Program will have available a registration permit program and at least two or more other regulatory alternatives to traditional permitting for qualifying sources. Such alternatives will provide equal or better environmental protection and	IN2.1 By June 30, 2006 answer yes or no, has a registration permit program been developed and count how many registration permits have been issued to facilities.  Baseline Due: N/A Check: June 30, 2006 Responsible for Collecting: Workgroup 11 IN2.2 By June 30, 2006 answer yes or no, at least two alternative regulatory tools have been developed and are being used by at least 1 facility. Such tools should not include traditional permits, consolidated construction/operation permits, expanded general permits, or registration permits.  Baseline Due: N/A Check: June 30, 2006 Responsible for Collecting: Workgroup 8 IN2.3 At each facility where an alternative regulatory tool is used, track whether emissions have been reduced or eliminated since use of the alternative tool. Track over a 5-year period. Conduct an analysis of the cause of emissions reductions, specifically whether the reduction was due to the use of the alternative regulatory tool and would not otherwise have occurred. Baseline Due: For each facility prior to use of alternative tool. Rechecks: June 30, 2006	Use new IT system to track number of facilities covered under registration permits.  At each facility where an alternative regulatory tool is used, use AEMS to establish a baseline emission inventory for the facility. Use the facility's annual consolidated reporting to track whether emissions have been reduced or eliminated since use of the alternative tool. Track over a 5-year period. Make adjustments to get

Target	APII Measure	Source
	IN2.4 At each facility that uses an alternative regulatory tool, track level of public satisfaction with meaningful participation.  Baseline Due: N/A Check: At each facility after issuance of new tool Responsible for Collecting: Workgroup 8	At each facility that uses an alternative regulatory tool, track public satisfaction with meaningful participation by a means that should be developed as part of the implementation of the new tool (such as hits on a facility specific web site, sending out questionnaires to interested public, etc.)
	IN2.5 By June 30, 2006, answer yes or no, were benefit analyses completed prior to implementation for: any new alternative tools; registration permits; the increased use of general permits and exemptions; and streamlined traditional permits.  Baseline Due: N/A Check: June 30, 2006	The benefit analysis should include an estimate of the development costs, implementation costs (including staffing requirements), savings to the regulated facility, expected environmental improvements, public satisfaction, and permittee satisfaction.
	Responsible for Collecting: Workgroups 3 & 4  IN2.6 Track the annual emission rates at regulated facilities and correlate data with selected economic indicators.  Baseline Due: September 30, 2004 (for FY04) Rechecks: June 30, 2005 and June 30, 2006  Responsible for Collecting: Workgroup 5	Use AEMS data to track annual emissions at regulated facilities. Information gathered should meet the needs of the workgroups who will use the data. For instance, some workgroups will need emissions data for a specific facility, some will need data for specific sectors, and some workgroups will need data for a certain size range of facilities.
	IN2.7 Track the compliance rates at regulated facilities.  Baseline Due: September 30, 2004 (for FY04) Rechecks: June 30, 2005 and June 30, 2006 Responsible for Collecting: Workgroup 5	Use WACD and Compliance Certification Reports to track compliance rates: number of certifying facilities in compliance divided by the total number of certifying facilities.

Target	APII Measure	Source
INNOVATION AND LEARNING TARGET #3: Whenever a new permit	IN3.1 By January 31, 2005 answer yes or no, has the air program defined appropriate communication and/or education methods for	
regulation or regulatory strategy is developed or updated, the Air Program actively works with partners to ensure there is	different degrees of permit regulation changes.  Baseline Due: N/A	
effective communication, opportunity for input, and an appappropriate level of	Check: January 31, 2005 Responsible for Collecting: Workgroup 2	
education.	IN3.2 On a semi-annual basis the first year, and annually thereafter, determine the percentage that communicated and/or educated partners using the appropriate method as specified above.	Assign someone to review all new or changed regulations to determine the percentage that communicated and/or educated partners using the appropriate method as specified above.
	Baseline Due: N/A	
	Rechecks: June 30, 2005, December 31, 2005, June 30, 2006 Responsible for Collecting: Workgroup 2	

AEMS – Air Emissions Management System

AMT – Air Management Team

APM – Air Permit Management Software

APS – Air Permit Software

APS – Air Permit Streamlining

Conop or ConOP or Con/OP – the operation permit that replaces a construction permit upon demonstration of compliance.

DHFS – Department of Health and Family Services

EPA – Environmental Protection Agency

GIS – Geographic Information System

PAL – Plant-wide applicability limit

PALs – Payroll authorization and leave system

PSC – Public Service Commission

WACD – Wisconsin Air Compliance Database

## **RECOMMENDATIONS FOR ENVIRONMENT TARGET #1**

Measure the % returns of compliance certification reports	Use WACD (Wisconsin Air Compliance Database) to measure the % returns of compliance certification reports.
Percent validity of compliance certification reports	Verify validity of compliance certification reports by performing inspections on a statistically significant sampling of facilities.  Note: Coordinate with CMS policy
Track mass emission rates of a sampling of facilities before and after issuance of a primary compliance document (existing facilities only).	Use Air Permit Software and AEMS (Emission inventory system) to track emission rates of facilities before and after issuance of a primary compliance document (existing facilities only).  Considerations: Look at emissions per unit throughput
Track facilities that have gone beyond compliance.  Track the number of tools available to encourage beyond compliance behavior.  Track the participation with each tool.	Look at a longer than annual time period on either side of permit issuance to account for economic fluctuations in emissions  Using the Voluntary Emissions Reduction Registry, track facilities that have gone beyond compliance. Survey these facilities to answer yes or no, do they feel rewarded for doing so. Use responses to adjust program as necessary.
Track compliance rates for facilities vs the regulatory method used.	Use Air Permit Software and WACD to track compliance rates for facilities vs the regulatory method used.